

PSJ2 Exh 77

From: Green, G. R.
Sent: Thursday, February 03, 2000 1:32 PM
To: Lang, James J
Cc: Ruess, Cheryl
Subject: RE: Attached SOP
Jim,

A couple of concerns as it relates to this SOP.

1. The order amounts \$25,000/\$100,000 sounds low in light of current OxyContin orders and future PalladoneXL business. I would think that we would be reviewing a large percentage of our orders under these guidelines.

Under *Sales Department National Accounts* my concerns are as follows:

1. Business objects gives us data that is a month old. For us to review this would be well after the shipment. In essence there is no real time data available to us so that we might participate in the decision process to release an order.

2. Report 8's are generated by account **monthly**, not by National Account Manager. Again, the limits on the orders would be far too low to trigger any sort of a review when you review orders on a monthly basis.

3. National Accounts primary function is to sell, not police orders. Based upon the above, it could also be argued that we don't have the real time data available to us to make these decisions. I would suggest that we be removed from this process.

We are not always aware of significant shifts in our customer's business until after it happens. We have, and will continue to share, what we know; when we know it. I would not think that National Accounts could make a significant contribution to this process with the tools we have to work with.

Regards,

GR

cc: chrono

G.R Green
g.r.green@pharma.com

-----Original Message-----

From: Lang, James J
Sent: Wednesday, February 02, 2000 9:44 PM
To: Little, Dawn
Cc: McGrath, Pat; Green, G. R.
Subject: FW: Attached SOP

Dawn

I have added a few questions. I am forwarding to Gr for his review as well. Overall it looks okay. Gr you will need to let us know whether you analyst is up to the task outlined in this sop. Please advise and also let me know what additional training if any is needed. Please call me if you have questions.

Jim

james.j.lang@pharma.com <Lang@Pharma.com>

203-854-7310

-----Original Message-----

From: Little, Dawn
Sent: Tuesday, February 01, 2000 10:57 AM
To: Lang, James J
Cc: McGrath, Pat
Subject: Attached SOP

Good morning, Jim!

Customer Service and Credit are in the process of revising the attached SOP relating to having a system in place which will disclose suspicious orders of controlled substances to Purdue personnel. We are required by the DEA to have such a system in place.

Section II specifies what the current role of the Sales function is in such a 'disclosure system'. Ed M has raised the question whether the steps included for the Sales function are practical from an analysis perspective to be a "real" control.

Would you please take a look at this SOP, **specifically Section II**, and call me (ext. 7076) to briefly discuss?

I appreciate your input.

<< File: SOP #7.7 - DRAFT REVISION #1 System to Disclose Suspicious Orders of Controlled Substances.doc >>

Regards,
DAWN